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March 27, 2001

Mr. Ed Boyle
Northern Division-NAVT-AC
10 Industrial Highway
Code 1811/EB-Mail Stop 82
Lester, PA 19113-2090

Re: Draft Report titled
Characterization of CVOC Contamination
At the Former PR-58 Nike Site and
Adjacent NAVY NCBC Davisville
Site 03 February 2001
North Kingstown, RI

Dear Mr. Boyle:

The following comments were developed by Applied Enviro-Tech, Inc. (Applied) as TAG contractor for the RI RC&D for the above referenced report.

- 1) Applied strongly supports re-sampling all private wells discovered in 1997 and sampled at that time. In addition, Applied recommends due to the presence of CVOC's in bedrock and the potential for transport in any direction based on fracture trends, a private well search be included in a reasonable radius around the subject area and additional sampling if any other private wells are discovered. Applied suggests in addition to the review of water department records discussed in Section 6.3.3.1, the search could include an analysis of anyone within a reasonable radius of the subject area not receiving a water bill as a potential private well.
- 2) It is difficult to ascertain from this report what compounds and where exceed applicable MCL or RI GA and/or GB standards. Applied recommends a table with

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historic and current data be developed and exceedances noted and standards highlighted.

- 3) It is unclear in the report where groundwater surface contours are presented for all wells during a consistent time frame. In addition, temporal data is needed consistently for all wells to provide meaningful vertical groundwater flow gradients.
- 4) Section 5.1.1 strongly supports the presence of NAPL at the source area and biodegradation parameters were collected in other wells during this investigation. Why isn't an investigation to delineate the extent of NAPL recommended? Also no attempt to conceptualize plume geometry utilizing biodegradation parameters was attempted in this evaluation. This data, if developed, could enhance targeting additional subsurface investigations and possibly support future natural attenuation remedy selection.
- 5) Were Dissolved Oxygen and temperature obtained "in-situ"? The newly installed wells are exhibiting high values i.e. 12.17 mg/L. Is this reliable?
- 6) Figure 2-3 outlines PR-58 Soil Gas Sampling Activity. What area is this on PR-58?
- 7) Some wells are reporting excessively high electrical conductance values. Please explain.
- 8) It is difficult to ascertain without historical tables what the CVOC's trends have been over the years. Likewise the supporting biodegradation values.
- 9) A data gap exists in the north northwestern area of the site and northeastern area, beyond EA 116R. Is future work proposed for these areas?
- 10) One objective stated for this additional investigation was to assess the conditions for and progress of natural attenuation of CVOC. However although abundant data is available from this and prior data sets, only two paragraphs in section 6.3.3.4 discuss natural attenuation and result in a contradiction with no recommendation for resolution. Applied recommends using this available data, after QA/QC, for further conceptual development.

Please contact Anne Heffron at (401) 792-8260 concerning these comments.

Sincerely,
APPLIED ENVIRO-TECH, INC.



Anne Heffron, RPG

CC: Betsy Morrison